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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Arsenal Business Center Inspection Report

JAN 23 1998

FROM: for Richard V. Pepino, Chief TAS
Office of Enviromental Programs (3ES30)

TO: Aquanetta Dickens, Chief
Toxics Programs and Enforcement Branch (3WC33)

and

Harry Daw, Chief
RCRA Compliance and Enforcement Branch (3WC31)

Attached for your consideration is an inspection report prepared by our Facility Inspection Program in Annapolis, MD, concerning an inspection conducted at the Arsenal Business Center, Philadelphia, PA, on October 22 and 23, 1997. This inspection included an evaluation of compliance for both the TSCA/PCB and RCRA regulations. Should you have any questions, please contact Mr. Gerard Crutchley at 410/573-2780.

Attachment

Multi-Media Inspection
TSCA/PCB & RCRA

Arsenal Business Center
5301 Tacony St.
Philadelphia, Pa. 19137

Date of Inspection: October 22 & 23, 1997

EPA Representatives:

Gerard Crutchley
Environmental Protection Specialist
Region III, Annapolis

Jose Jimenez
Chemical Engineer
Region III, Philadelphia

Facility Representatives:

Mark Hankin
President

Jay Comly
New Huntingdon Development Corp.

Michael Markovitz
Vice President

Background

The Environmental Protection Agency (EPA), Region III's Facility Inspection Program received a request from EPA Region III's Waste and Chemical Management Division to conduct a multi-media inspection at the Arsenal Business Center (former Frankford Arsenal) located in Philadelphia, Pennsylvania. Representatives from the Facility Inspection Program had inspected the facility on two previous occasions, December 6, 7, & 8, 1995 and April 2 & 3, 1996. During

the two previous visits at the facility, the EPA inspectors documented numerous problems with the TSCA/PCB regulations. This inspection was requested as a follow up to the previous inspections to determine if the facility has taken the appropriate actions to comply with the PCB regulations at 40 CFR, Part 761.

In addition, the inspector was asked to review the facility's compliance with hazardous waste regulations (RCRA). During the April, 1996 inspection, EPA personnel observed a number of drums and several gas cylinders stored in an old bunker building. It was not determined at that time what might be contained in the drums and it appeared that material from some of the drums had leaked onto the floor in the bunker building.

The facility was informed of the subject inspection approximately one week prior to the inspection in a letter that was sent from EPA Region III to the facility's legal representative, Fellheimer, Braverman & Kaskey, Attorneys at Law.

Inspection Activities

Opening Conference

On October 22, 1997, Gerard Crutchley and Jose Jimenez arrived at the Arsenal Business Center at 1000 and met with Mr. Mark Hankin. The inspectors presented their credentials to Mr. Hankin identifying them as authorized representatives for the EPA Regional Administrator. The inspectors also presented to Mr. Hankin a TSCA Notice of Inspection and a TSCA Inspection Confidentiality Notice. Mr. Hankin read and signed the TSCA Notice of Inspection. Mr. Hankin also read the TSCA Inspection Confidentiality Notice and said that he would return it after reviewing it more thoroughly.

The EPA inspectors told Mr. Hankin what they expected to accomplish during the inspection including, but not limited to, a tour of all locations presently containing PCBs and all locations where PCBs were previously located and a review of all facility records related to the use, storage and disposal of PCBs and PCB Items. Mr. Hankin said that most of the records were presently in Mr. Alan Fellheimer's office and that he would have to have them brought to the facility. For purposes of the facility tour, Mr. Hankin said that the EPA inspectors would be accompanied by Mr. Jay Comly, an employee for the New Huntingdon Development Corporation.

Mr Hankin did discuss some of the actions which the facility has taken to comply with the PCB regulations including the removal of some transformers and capacitors. He said that all transformers and enclosures have been cleaned to remove PCB contamination, the transformers have been painted and the floors in the enclosures have been sealed. He also said that secondary containment has been provided at all PCB Transformer locations and all of the transformers and enclosures have been marked with PCB M_L labels.

10/22/97

Facility Tour

Building 202, Substation 20

An electrical room located inside of building 202 contains three PCB Transformers. The door to the electrical room was locked and it was marked with a PCB M_L label. One Transformer was marked with the PCB M_L label, but transformer nos. 15173 & 15174 were not marked with the PCB M_L label. These two transformers had a label of the same dimensions as the PCB M_L label; however, they were covered with paint (See Photo No. 1). Mr. Hankin immediately told Jay Comly to obtain new labels and place them on the two transformers where the labels had been covered by paint. Mr. Comly left and returned a short time later with new labels which he then placed on the two transformers. There were no leaks or stains observed on or around any of the three transformers. A concrete block containment area had been constructed around the three transformers. The contained area measured approximately 248" by 72" by 8".

The electrical room also contained a metal capacitor cabinet. There were twelve capacitors in the cabinet and each was marked with a PCB M_L label. The nameplate on the cabinet indicated the capacitors were manufactured by Aerovox, serial no. 4381318 and were rated at 460 volts. A concrete block containment area had been constructed around the capacitor cabinet. There were no leaks or stains observed on or around the capacitors.

This building is used by the Philadelphia District Attorney's office for storage of confiscated items.

Building 210, Substation 22

A fenced enclosure located adjacent to building 210 contains six transformers. The entry gate to the enclosure was marked with a PCB M_L label. Each of the transformers had been freshly painted. Three of the transformers were marked with PCB M_L labels and the other three were marked with PCB Contaminated labels. A concrete block containment area had been constructed around the six transformers. The containment area measured approximately 352" by 80" by 8". The three transformers marked as PCB Contaminated were not in service at the time of the inspection. There were no leaks or stains observed on or around any of the six transformers.

It was noted that the nameplates on all six transformers had been covered by paint. The EPA inspectors recommended to facility personnel that they have the paint removed from the nameplates.

This building is a multi tenant building.

Building 215, Substation 23

This area consists of an outdoor fenced enclosure which contains three PCB Transformers. The entry gate was locked and the enclosure was marked with a PCB M_L label. During the 1995 EPA inspection, this substation contained five PCB Transformers. Two of the transformers have been removed from this substation since the 1995 inspection. Each of the transformers was marked with a PCB M_L label; however, one of the labels was a paper copy which was taped to the transformer. The EPA inspectors recommended that the paper label be replaced with a standard PCB M_L label. There were no leaks or stains observed on or around the transformers. A concrete block containment area had been constructed around the three transformers. The contained area measured approximately 344" by 208" by 8". The nameplates on all three transformer had been covered with tape or paint. The EPA inspectors recommended removing the tape/paint from the nameplates.

This building was vacant at the time of the inspection.

Building 219, Substation 24

An outdoor fenced enclosure located adjacent to building 219 contained six PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers was marked with a PCB M_L label and there were no leaks or stains observed on or around any of the transformers. Two of the six transformers were not in service at the time of the inspection. The nameplates on two of the transformers were covered with paint. The EPA inspector recommended removing the paint from the nameplates.

An indoor electrical room is located adjacent to the substation. The door to the room was locked and it was marked with a PCB M_L label. During the 1995 and 1996 EPA inspections, the EPA inspectors observed two metal cabinets which contained a total of twenty three PCB capacitors. The EPA inspectors had also observed a wet area on the floor under the cabinets during the two previous inspections and analytical results from samples collected at that time indicated high concentrations of PCBs. At the time of the current inspection, the EPA inspectors observed that the capacitors had been removed from the electrical room the leaked material had been cleaned up and the floor was freshly painted (See Photo No. 2) and according to facility personnel had been sealed.

The building was vacant at the time of the subject inspection.

Building 119, Substation 2411

This area consists of an outdoor fenced enclosure located on the corner of building 119. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. The enclosure contained two PCB Transformers. Only one of the transformers was marked with a PCB M_L label. The other transformer was marked with a label the same dimensions as the PCB M_L label, but it was covered with paint (See Photo No. 3). The facility representative, Jay Comly, placed a new label on the transformer at the time of the visit. This area is contained on

two sides by the outside walls of the building and on the other two sides by a concrete block containment structure measuring 8" high. There were no visible openings in the containment wall. There were no leaks observed on or around either of the two transformers.

Building 119 is occupied by an audio/video repair facility.

Building 120, Substation 13

An outdoor fenced enclosure is located adjacent to an indoor electrical room in building 120. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. The enclosure contained three PCB Transformers. Each of the three transformers was marked with a PCB M_L label and no leaks were observed on or around any of the three transformers. The nameplate on one of the transformers was covered with tape. The EPA inspectors recommended removing the tape from the nameplate. A concrete block containment wall 8" high and 368" long had been constructed across one side of the enclosure. The other three sides were enclosed by the outside walls of the building. During the 1995 EPA inspection, the EPA inspectors observed several drums containing new chemicals (e.g. toluene, methanol, 111- trichloroethane) stored within five meters of the transformer enclosure. At the time of the subject inspection there were no materials stored within five meters of the enclosure.

The doorway to the indoor electrical room adjacent to the transformer enclosure was marked with a PCB M_L label; however, there were no PCBs observed in the electrical room.

Building 120 is occupied by C-LEC Plastics Inc.

Building 120, C-LEC Plastics Inc.

Following the inspection of the building 120 transformer enclosure, the EPA inspectors, while walking past a loading dock area outside of building 120, observed a dumpster next to the building which contained five large plastic bags. One of the bags was torn and it contained what appeared to be a fine white powder (See Photo No. 13). The inspectors also observed what appeared to be the same material on the concrete around the dumpster (See Photo Nos. 14 & 15). What appeared to be water was flowing from a garden hose which extended from a garage door out to the dumpster area. The water was flowing from the hose onto the concrete and flowing into a drain located in the concrete adjacent to the metal dumpster (See Photo No. 16). Some of the white powdery material was being washed down the drain by the water flowing from the hose.

The EPA inspectors went into the building and asked for the owner to find out what the powdery material is and also to find out what was flowing from the garden hose. The inspectors met with Mr. Mike Walsh, Vice President of C-LEC Plastics. The inspectors presented their credentials and asked Mr. Walsh about the powdery material and the garden hose. Mr. Walsh explained that the facility manufactures large plastic blocks using polystyrene. The product trade name is rexoilite 1422. Mr. Walsh said they then machine the blocks to specific shapes for sale

to their customers. When asked about the garden hose, Mr. Walsh showed the inspectors an area inside the building where they wet sand the plastic blocks. The water and the sanding fines from this process drain into a metal container under the sanding table. The sanding fines settle out and the water drains off through the garden hose and into the drain outside the building. Neither Mr. Walsh or Jay Comly knew if the drain was connected to the city sewer or if it was a storm drain. Mr. Walsh said that the sanding fines are eventually removed from the metal container, placed in plastic bags and put into the dumpster outside for disposal. Mr. Walsh said that this was the material which we had observed in the dumpster and on the concrete around the dumpster. Mr. Walsh provided the inspector with a copy of an MSDS sheet (See Attachment No. 1) for the facility's product (rexolite). Although the MSDS sheet indicates that the material is non-toxic, it does state that proper disposal of the material would be in a landfill or burned in an adequate incinerator. The EPA inspector told Mr. Walsh that this material should not be laying on the concrete around the dumpster and certainly should not be allowed to wash down the drain adjacent to the dumpster.

Subsequent to the inspection, the EPA inspector referred this situation to Region III's Water Division.

Building 230, Substation 25

A fenced enclosure adjacent to building 230 contains four PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the four transformers was marked with a PCB M_L label. The nameplates on three of the four transformers were covered with tape or paint. The EPA inspectors recommended removing the tape/paint from the nameplates. A stain was observed on the concrete floor of the enclosure under the drain valve of one of the transformers (See Photo No. 4). There were no active leaks or other stains observed on or around any of the other transformers.

Building 230 is presently occupied by a company named Cafeco.

Building 126, Substation 15

An outdoor fenced enclosure adjacent to building 126 contains one PCB Transformer. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. The transformer was marked with a PCB M_L label. The EPA inspector observed a stain on the concrete floor of the enclosure under the transformer drain valve and tap changer (See Photo No. 5). There were no active leaks observed on the transformer. A concrete block containment wall had been constructed around three sides of the enclosure. The outside wall of building 126 formed the other side of the enclosure. The concrete block area measured 96" by 96" by 8".

The building is currently occupied by a crematory.

Building 301, Substation 31

An outdoor fenced enclosure located adjacent to building 301 contains four PCB

Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the four transformers was marked with a PCB M_L label. There were no leaks or stains observed on or around any of the transformers. A concrete block containment wall had been constructed on two sides of the enclosure. The other two sides of the enclosure consisted of the outside walls of building 301. The concrete block walls measured 240" by 240" by 8".

An indoor electrical room located adjacent to the enclosure contained a metal capacitor cabinet that was marked with a PCB M_L label; however, all of the capacitors had been removed from the cabinet and no stains were observed on or near the cabinet. This same cabinet was observed during the 1995 EPA inspection.

Building 301A

Building 301A is a quonset hut type building which is located adjacent to building 301. The building was previously used to store a large number of drums which contained PCBs. It is not known when the drums were removed; however, during the 1996 EPA inspection, samples were collected from the floor of the building in two different rooms. The results of those samples indicated high concentrations of PCBs. At the time of the 1996 inspection, the EPA inspector also observed seven capacitors stored in the building.

At the time of the subject inspection, the EPA inspector noted that the capacitors have since been removed from the building and the floor tile and concrete in the larger of the two rooms has been removed. The floor tile in the smaller of the two rooms had also been removed; however the imprints of the tiles were still visible on the concrete floor.

Building 301A was vacant at the time of the subject inspection.

Building 238, Coal Tech Corp.

While walking to the next transformer location, the inspection team passed by building 238 which is occupied by the Coal Tech Corp. Outside of the building, the EPA inspector observed a number of 55 gallon drums. There were approximately thirty-five drums, seven of which were full. The seven full drums contained a greyish, powdery material. There were no markings or labels on the drums. The EPA inspecters went into the building and met with Dr. Bert Zuaderer, President, Coal Tech Corp. Dr. Zauderer explained that the material in the drums is slag and ash generated by the facility's coal combustor unit. Dr. Zauderer further explained that his facility is engaged in a U.S. Department of Energy sponsored coal combustion R & D project. The EPA inspector asked if the material in the drums had ever been analyzed and Dr. Zauderer replied that the material periodically undergoes TCLP Leachate analysis and the results indicate that it is a non-hazardous material. The EPA inspector asked for a copy of the most recent analysis and Dr. Zauderer stated that those records were maintained in his corporate office and that he would have to mail a copy of the analysis to the EPA inspector. On December 3, 1997, the EPA inspector, Gerard Crutchley received in the mail a copy of the most recent analysis for the slag/ash material. These results indicate that the material is non-hazardous. A

copy of those results are included as an attachment to this report (See Attachment No. 2).

Dr. Zauderer also stated that the material in the drums is periodically picked up by Kasper Bros. and transported to the Grand Central Landfill in Penn Argyl, Pa.

Building 250, Substation 27

An outdoor fenced enclosure located adjacent to building 250 contains three PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the three transformers was marked with a PCB M_L label and no leaks or stains were observed on or around the transformers. The nameplate on one of the transformers was covered with tape and the EPA inspectors recommended removing the tape from the nameplate. A concrete block containment wall had been constructed around the transformers. The containment area measured 232" by 192" by 8".

An indoor electrical room located adjacent to the enclosure had previously contained a metal capacitor cabinet with eleven PCB capacitors. The capacitors and the cabinet have since been removed and the floor in the room has been freshly painted (See Photo No. 6).

Building 128, Substation 128

Substation 128 is a large fenced enclosure which contains seven PCB Transformers and serves as the facility's main substation. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the seven transformers were marked with a PCB M_L label and no leaks were observed on or around any of the transformers. A concrete block containment wall had been constructed around the seven transformers which measured approximately 840" by 448" by 8 ".

Building 128 contains the main switchgear for the distribution of electrical power throughout the facility. During the 1995 EPA inspection, a large pole type transformer had been observed inside of building 128. This transformer has since been removed from the building. During the subject inspection, the EPA inspector observed a locked room which facility personnel said is used for storage. The doorway to the room was marked with a PCB M_L label. The facility representative unlocked the door and the inspectors observed that the only thing in the room was asbestos related cleanup materials (bags, labels, etc.). The facility representative said that he had no idea why the door was marked with a PCB label. The inspectors recommended that the label be removed from the door. The facility representative immediately removed the label from the door.

Buildings 247 & 248

Buildings 247 and 248 are concrete bunker type buildings where, during the 1996 EPA inspection, the EPA inspectors had observed a number of fifty-five gallon drums stored inside the buildings. At that time, Mr. Hankin said that he thought the drums came from another facility (Old York Rd. Bank) and they allowed the other facility to store them in the bunker

buildings.

At the time of the subject inspection, the EPA inspectors returned to these buildings and observed the same drums still in storage. Building 248 contained seven 55 gallon drums which were empty. Building 247 contained a number of 55 gallon drums, four in a front room and twenty seven in a back room. The back room also contained six old gas cylinders. The drums and the gas cylinders appeared to be in the same location as they were during the 1996 inspection. It was also noted that a number of fluorescent light ballasts observed during the 1996 inspection had been removed from the building.

Building 149, Substation 16

An outdoor fenced enclosure adjacent to building 149 contains three PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the three transformers were marked with a PCB M_L label and no leaks or stains were observed on or around any of the transformers. A concrete block containment wall had been constructed around the transformers which measured approximately 552" by 136" by 8".

At the time of the 1995 EPA inspection, building 149 was occupied by a company named "Bowmasters". This company operated an archery supply store and an indoor archery range which was accessible to the general public. This would classify the building as a "commercial building" as defined in the PCB Rule and would require the installation of enhanced electrical protection to prevent transformer ruptures due to electrical faults in the transformer. Since that time Bowmasters has moved out of the business center and the building is now occupied by a company named Chem Group Inc.

Building 55, Substation 5

An outdoor fenced enclosure located adjacent to building 55 contains six PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the six transformers was marked with a PCB M_L label; however, the labels on three of the six transformers were paper copies taped to the transformers. The EPA inspectors recommended replacing the paper labels with standard PCB labels. The facility representative immediately replaced the three labels. A concrete block containment wall had been constructed around all of the transformers and a brick containment had been constructed around a manhole located in the substation. At the time of the subject inspection four of the transformers were not in service. Building 55 was vacant at the time of the inspection.

Building 64, Substation 7

An outdoor fenced enclosure adjacent to building 64 contains six PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the six transformers were marked with PCB M_L labels. The nameplates on several of the transformers had been covered with paint and the EPA inspectors recommended removing the paint from the nameplates. A concrete block containment wall had been constructed around the

transformers which measured approximately 560" by 96" by 8". No leaks or stains were observed on or around any of the transformers.

Building 64 was vacant at the time of the inspection.

Building 48, Substation 6

An outdoor fenced enclosure located at the corner of building 48 contains four PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the four transformers were marked with a PCB M_L label; however, the labels had been placed over the nameplates on two of the transformers and a paper label had been taped to another of the transformers. The EPA inspectors recommended removing the labels which had been placed on the transformer nameplates and placing them on the sides of the transformers. The EPA inspectors also recommended replacing the paper label with a standard PCB label. A concrete block containment wall had been constructed around the transformers which measured approximately 256" by 192" by 8". No leaks or stains were observed on or around any of the transformers.

Building 48 is a multi-tenant building.

Building 47, Substation 4

An outdoor fenced enclosure located adjacent to building 47 contains three PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers were marked with a PCB M_L label. The nameplate on one of the transformers had been covered with paint and the EPA inspectors recommended removing the paint from the nameplate. No leaks or stains were observed on or around any of the transformers. A concrete block containment wall had been constructed around the transformers which measured approximately 272" by 120" by 8".

An indoor electrical room was located adjacent to the substation. The door to the room was locked and it was marked with a PCB M_L label. Two metal capacitor cabinets each containing twelve PCB capacitors were located inside the room. The serial nos. On the cabinets were 94816 & 94817. Each of the capacitors were marked with a PCB M_L label and no leaks or stains were observed on or near the capacitors. The capacitors were all rated at 460 volts.

Building 47 was empty at the time of the inspection.

Building 44, Substation 401

An indoor electrical room located in building 44 contains one PCB Transformer. The entrance door to the room was locked and it was marked with a PCB M_L label. A concrete block wall, eight inches high had been constructed across the entrance way. No leaks or stains were observed on or near the transformer.

Building 44 is occupied by Hotel Furniture Liquidators.

Building 55, electrical room

An electrical room located inside of building 55 contains six metal capacitor cabinets. The entry door to the room was locked and it was marked with a PCB M_L label. Three of the cabinets contained Aerovox, PCB capacitors, serial nos. 4381314, 4381299, & 4381310. A total of thirty six capacitors were in these three cabinets and each capacitor was marked with a PCB M_L label. The other three capacitor cabinets contained a total of thirty-two Cornell Dublier, PCB capacitors, serial nos. 94812, 94814, & 94815. Each of the capacitors was marked with a PCB M_L label. All of the capacitors in the room were rated at 460 volts and no leaks or stains were observed on or near the capacitors.

Building 112, Substation 12

An outdoor electrical substation located adjacent to building 112 contained two PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers was marked with a PCB M_L label. A concrete block containment wall had been constructed around the transformers which measured approximately 136" by 88" by 8". No leaks or stains were observed on or near either of the transformers.

Building 112 was vacant at the time of the inspection.

Later in the day while reviewing the field notes, the EPA inspector noted that the two transformers listed for this location had originally been listed as being at building 215, substation 23. It was also noted that the facility's PCB monthly report from the 1995 inspection listed building 112, substation 12 as containing only one transformer. The EPA inspectors were not able to clarify this discrepancy during the subject inspection.

Building 39, Substation 201

An indoor electrical room located in building 39 contained one PCB Transformer. The entry door to the room was locked and it was marked with a PCB M_L label. The PCB Transformer was marked with a PCB M_L label and no leaks or stains were observed on or around the transformer. A concrete block containment wall had been constructed across the doorway to the room and around an electrical conduit manhole in the floor of the room.

Building 39 is occupied by the New Huntingdon Development Corporation.

Building 120, Substation 13

The EPA inspectors returned to building 120 to check an electrical room located adjacent to the substation. The entry door to the room was locked and it was marked with a PCB M_L label; however, there were no PCBs or PCB Items observed inside the room.

After leaving building 120, the EPA inspectors returned to the business center's office to meet again with Mr. Hankin to provide him with a summary of that day's activities. During the meeting, Mr. Hankin said that he had contacted Mr. Fellheimer's office and was told that there were six full boxes of records at that office. Mr. Hankin then said that he would have the records delivered to the business center on the following day so they would be available for inspection.

The EPA inspector provided a brief description of the day's activities to Mr. Hankin and informed of the areas where discrepancies were observed (e.g. locations where labels were missing or painted over, and areas where stains were observed near PCB Transformers). The EPA inspector, Gerard Crutchley, also told Mr. Hankin about the drums which were still located in building 247 and 248. Mr. Hankin replied to this by saying that he thought those drums had been removed from the facility.

10/23/97

The EPA inspectors arrived at the facility at 0800 and met with Mr. Jay Comly to continue the tour of the subject facility.

Building 150, Substation 17

An indoor electrical room located on the second floor of building 150 contains four PCB Transformers. The first floor entry door was locked and was marked with a PCB M_L label. The second floor entry to the electrical was also locked; however it was not marked with a PCB label. Each of the four transformers were marked with a PCB M_L label. The EPA inspectors observed a stain on the concrete floor under the drain valve of a Niagra transformer, serial no. 26205 (See Photo No. 7). The stain appeared to be wet indicating that the leak may have recently occurred.

The EPA inspectors also observed two metal capacitor cabinets in the electrical room. Each cabinet contained nine PCB capacitors. Each of the capacitors was marked with a PCB M_L label and there were no leaks or stains observed on or near the capacitors.

A concrete block containment wall, eight inches high, had been constructed across the entrance to the room. Building 150 was vacant at the time of the inspection.

Building 28, Substation 1101

An outdoor fenced enclosure located adjacent to building 28 contains two PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Only one transformer was marked with a PCB M_L label. Transformer no. 3360 was marked with a label the same dimensions as the PCB M_L label; however it had been covered with paint and the nameplate on the other transformer had also been painted over. The EPA inspectors told the facility representative that a new PCB label needed to be placed on the transformer and they recommended removing the paint from the transformer nameplate. A concrete block containment wall had been constructed around the transformers which measured

approximately 136" by 112" by 8". There were no leaks or stains observed on or near either of the transformers.

Building 28 was vacant at the time of the inspection.

Building 108, Substation 11

An outdoor fenced enclosure covered by a roof and located adjacent to building 108 contains five PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers were marked with a PCB M_L label and no leaks or stains were observed on or around the transformers. Part of the tin/wood roof had collapsed and two pieces of wood were hanging down within a foot of one of the PCB Transformers. The EPA inspectors told the facility representative that the wood needed to be removed from the substation. A concrete block containment wall had been constructed around the transformers which measured approximately 304" by 184" by 8 ". A nameplate on one of the transformers was covered with tape. The EPA inspectors recommended removing the tape from the nameplate.

Building 108 was vacant at the time of the inspection.

Building 12, Substation 1

An indoor electrical room located in building 12 contains two PCB Transformers. The door to the electrical room was locked and it was marked with a PCB M_L label. Both of the transformers were marked with a PCB M_L label and no leaks or stains were observed on or near either of the two transformers. A concrete block containment wall eight inches high had been constructed across the doorway to the electrical room.

The electrical room is divided into two halves, each having a separate entrance door. The other side of the room contained a metal capacitor cabinet that was marked with a PCB M_L label. The cabinet was completely enclosed and the EPA inspectors could not determine how many capacitors were mounted in the cabinet; however, based on the physical size of the cabinet it appeared that it could hold about six capacitors. The nameplate on the cabinet indicated that the capacitors were rated at 460 volts and the serial no. is 94813.

Building 12 was not occupied at the time of the inspection.

Building 215, Substation 23

The EPA inspectors returned to this location at the request of the facility personnel who wanted the inspectors to see that they had begun to remove the paint/tape from the transformer nameplates.

The approximate measurements of the concrete block containment walls observed at a number of the transformer locations were based on a count of the number of concrete blocks

needed to form the sides of the walls at the various locations. The EPA inspector then used the measurements of a standard concrete block (8" x 8" x 16") to determine the approximate measurements of the wall at each location. The following table contains a listing of each transformer location where a containment wall had been constructed as well as the capacity in gallons for each location and the total amount of PCB fluid in gallons for each location.

PCB Transformer Locations	Approximate measurements of contained area	Capacity in gallons of contained area	Gallons of fluid in PCB Transformers
Bldg. 202, substation 20	83.2 cu. ft.	622	790
Bldg. 210, substation 22	130.9 cu. ft.	979	858 (PCB), 180 (PCB Contaminated)
Bldg. 215, substation 23	332.7 cu. ft.	2489	810
Bldg. 126, substation 15	42.9 cu. ft.	321	285
Bldg. 301, substation 31	268.0 cu. ft.	2005	1120
Bldg. 250, substation 27	206.9 cu. ft.	1548	769
Bldg. 128, substation 128	1749.4 cu. ft.	13,086	10,717
Bldg. 149, substation 16	348.3 cu. ft.	2605	790
Bldg. 64, substation 7	250.3 cu. ft.	1872	1286
Bldg. 48, substation 6	228.3 cu. ft.	1708	1040
Bldg. 47, substation 4	152.1 cu. ft.	1138	528
Bldg. 112, substation 12	55.3 cu. ft.	414	
Bldg. 28, substation 1101	70.4 cu. ft.	527	
Bldg. 108, substation 11	259.4 cu. ft.	1940	1311

Sample Collection

At the completion of the facility tour, the EPA inspectors returned to several locations to collect samples where stains/leaks had been observed during the tour. The following table contains a description for each sample location and the analysis requested for each sample:

Sample No.	Sample Description/Location	Analysis
WB	Wipe Blank	PCB
ABC-15	Building 230, Substation 25, wipe sample from stain on concrete under drain valve of transformer # 2. (Photo no. 8)	PCB
ABC-16	Building 126, Substation 15, wipe sample from stain on concrete under drain valve of transformer no. 1314-1. (Photo no. 9)	PCB
ABC-17	Building 150, Substation 17, wipe sample of stain/residue on concrete under drain valve of transformer no. 26205. (Photo no. 10)	PCB
ABC-18	Building 301A, wipe sample from floor in smaller room of building (Photo No. 11).	PCB
247-1	Sample from 55 gallon drum, outside hallway	PCB, FTIR Scan
247-2	Sample from 55 gallon drum, back room of building	PCB, FTIR Scan

The EPA inspector used a laboratory towel saturated with hexane to collect the wipe samples. A standard size template (10 cm by 10 cm) was used to delineate the area of each wipe sample. Although duplicate samples cannot be collected when wipe sampling, the EPA inspector used templates placed side by side at each sample location so as to provide the facility with a split sample; however, at building 150, the stained sample area was only 1 to 2 inches in diameter and the EPA inspector had to wipe this area twice in order to provide a split sample for the facility. Following the collection of the wipe samples, the EPA inspectors returned to building 150 at the request of facility personnel who stated that they had repaired the leak on transformer no. 26205.. Upon returning to this location, the EPA inspectors observed that a sealant had been placed on the transformer sample tap and drain valve (See Photo No. 12). It was not known if they cleaned the floor under the drain valve.

The samples from the two drums at building 247 were collected utilizing a clean glass coliwassa sampler for each drum.

A sample of the white powdery material next to the dumpster at C-LEC Plastics was also collected; however, this sample was not analyzed. The decision not to analyze the sample was based on a review of the MSDS sheet provided for the material.

All of the samples remained in the custody of the EPA inspector (Gerard Crutchley) and were returned to the EPA laboratory in Annapolis for analysis.

Analytical Results

The following table contains the PCB analytical results from the wipe samples collected during the inspection. Also included in the table are the regulatory limits taken from the PCB

Spill Cleanup Policy.

Sample No.	Sample Description	Sample Results ug/wipe	Regulatory Limit ug/100 cm^2
WB	Wipe Blank	Not Detected	-------
ABC-15	wipe sample, stain on floor of substation in building 230	2,014	100
ABC-16	wipe sample, stain on floor of substation in building 126	492	100
ABC-17	wipe sample, stain on floor of electrical room in building 150	112,900	10
ABC-18	wipe sample, concrete floor in smaller room of building 310A	5.26	10

The samples collected from the two drums located at building 247 were analyzed for PCB content; however, no PCBs were detected in either of the samples. The laboratory also analyzed both samples for component identification using FTIR (FOURIER Transform Infrared) scans combined with library search programs. Results of this analysis indicated that spectra of both samples did match some of the known gear oil/hydraulic oil spectra in the Nicolet Oil Spectra Library. This indicates that the materials sampled are probably nothing more than waste oils.

Copies of the analytical results are included as attachments to this report (See Attachment Nos. 3 & 4).

Closing Conference

Following the tour of all areas and the collection of all the samples, the EPA inspectors returned to the facility's office to review any records which might be available regarding the PCBs and PCB Items at the facility. At this time the inspectors had also planned to provide facility personnel with a summary of the preliminary findings from the inspection. Upon returning to the office, Mr. Hankin met the inspectors and told them that he would be unable to meet with them because of a prior commitment; however, he had asked Mr. Michael Markowitz, Vice President to meet with the inspectors for the record review.

A number of cardboard boxes containing records had been brought to the office from Mr. Alan Fellheimer's law office. Prior to beginning, Mr. Markowitz requested that he be allowed to record on audio tape, the record review and closeout meeting. The EPA inspectors agreed to the session being taped. Mr. Markowitz said that he could not allow the inspectors to look at all of the records because some of the boxes may contain confidential material. He did say that he

would look through each box and tell the inspectors what it contained and if there were records the inspectors needed to review, he would pull those records out of the box for review. The first box contained mostly correspondence; however, there was one file which contained copies of PCB manifests. The EPA inspector, Gerard Crutchley requested to review that file. Mr. Markowitz did pull that file out of the box and hand it to the inspector. The inspector had looked at approximately half the records contained in the file when Mr. Markowitz reached out and retrieved the file. Mr. Markowitz said that the file contained confidential information. At that point, Mr. Markowitz said that he would look through the boxes containing the records and make a decision on which records he would allow the inspectors to review. After some further conversation, the EPA inspector, Gerard Crutchley, told Mr. Markowitz that he could not conduct a thorough record review without being allowed direct access to the records in the boxes.

Mr. Markowitz said that it would probably be better if the inspectors drafted a letter to the facility and requested the specific records which were needed to complete the record review. Prior to leaving, Jose Jimenez requested that the inspectors be provided with a copy of the taped record of the record review and closeout meeting. Mr. Markowitz denied his request.

Subsequent to the inspection (November 10, 1997), the EPA inspector, Gerard Crutchley, sent a letter to the facility requesting copies of the facility's 1995 & 1996 Annual Document Logs, copies of all PCB Transformer quarterly inspection records for 1996 & 1997 and clarification as to who actually conducts the quarterly inspections (See Attachment No. 5).

The request letter was apparently forwarded to the facility's legal representatives who reponded in a letter dated Decmber 5, 1997. The response indicated that these records have already been supplied to EPA at least twice and they believe it is unreasonable to copy these records for a third time. They did however, state that we could travel to their offices to select records for copying and then have them copied at EPA's expense (See Attachment No. 6).

Summary of Findings

EPA Region III's Facility Inspection Program received a request from Region III's Waste and Chemical Management Division to conduct a TSCA/PCB and a RCRA/CEI inspection at the Arsenal Business Center located in Philadelphia, Pennsylvania. The inspection was conducted on October 22 & 23, 1997 by Gerard Crutchley, Environmental Protection Specialist, ESD and Jose Jimenez, Chemical Engineer,WCMD. Following is a listing of the findings from the inspection:

TSCA/PCB

1. Four PCB Transformers were marked with labels having the same dimensions as the PCB M_L label; however they were covered with paint. The facility personnel did replace these labels during the subject inspection.

2. The doorway into a electrical room containing PCB Transformers on the second floor of building no. 150 was not marked with a PCB M_L label.

3. At eleven different substations, the EPA inspectors observed that the manufacturers nameplates on PCB Transformers had been covered with paint or tape. Although not a regulatory issue, the inspectors recommended to facility personnel that the paint/tape be removed from the nameplates so that the information on the nameplates could be easily read.

4. PCB Transformers at three different locations were marked with paper labels which were copied from a PCB M_L label. These labels do not meet the specifications of the M_L mark as defined by the PCB Rule.

5. Part of the roof covering a PCB Transformer enclosure (building 108, substation 11) had collapsed and in doing so had left broken pieces of wooden lumber hanging adjacent to a PCB Transformer. The EPA inspectors told facility personnel that the broken lumber needed to be removed because it is considered to be combustible material.

6. The EPA inspectors observed leaks or evidence of leaks (stains) from PCB Transformers at three different locations. The analytical results from wipe samples collected for PCB analysis at the three locations indicate PCB levels which exceed the regulatory limits specified in the PCB Spill Cleanup Policy.

7. The doorway into a storage room inside of building 128 was marked with a PCB M_L label. At the time of the inspection, there were no PCBs in the room and the EPA inspectors recommended that the label be removed from the door.

8. The EPA inspectors were unable to determine the facility's compliance with PCB Recordkeeping requirements because they were not allowed direct access to the records at the time of the inspection

RCRA

Although it appears that the facility does not generate any material which would be subject to hazardous waste regulations under RCRA, the EPA inspector did make the following observations at the time of the inspection:

1. At one of the facility's tenant locations (Coal Tech Corp.), the EPA inspector observed a number of drums stored outside of the building. Seven of the drums contained a grey, powdery material. The tenant owner, Dr. Zauderer, explained that the material in the drums is slag and ash which is generated by the facility's coal combustor unit and eventually removed from the site for disposal in a landfill. TCLP leachate analysis provided by Dr. Zauderer subsequent to the inspection indicates that the material is non-hazardous.

2. At another of the facility's tenant locations (C-LEC Plastics, Inc.), the EPA inspector observed a fine white powder material on the concrete pavement adjacent to a dumpster. The EPA inspector also observed what appeared to be water flowing from a garden hose onto the concrete and washing some of the white powder into a drain. The tenant owner provided a copy of an MSDS sheet for the material which indicated that it was non-toxic; however, the EPA inspector told the tenant owner, that the material should be cleaned up and not be allowed to wash into the drain. This situation was referred to Region III's Water Program.

3. A number of 55 gallon drums and six gas cylinders are located in building no. 247. These materials have been at this location for at least two years. According to Mr. Hankin, the drums came from another facility outside the business center and they had allowed the other facility to store them in the building. Samples collected from two of the drums were analyzed for PCB content; however no PCBs were detected. These samples were also scanned for component identification and the results of the scan indicate that the material in these two drums is waste oil (gear/hydraulic oil). Although these materials might be nothing more than waste oils, some of the materials have leaked from the drums onto the floor of the building. All of these materials should be cleaned up and the drums and gas cylinders removed from the building for proper disposal.

List of Attachments

Multi-Media Inspection Report
Arsenal Business Center
Philadelphia, PA

Receipt for Samples and Documents - Regional Office Copy
Notice of Inspection - Regional Office Copy

Attachment No. 1 Material Safety Data Sheet for Rexolite 1422

Attachment No. 2 TCLP Leachate Analysis by Coal Tech Corp.

Attachment No. 3 OASQA Lab Analytical Report

Attachment No. 4 OASQA Lab Analytical Report

Attachment No. 5 EPA Request for Copies of Records

Attachment No. 6 Response to EPA Request for Records

Photographs Numbered 1 through 26